

# **EXHIBIT F**

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

GOOGLE LLC,

Plaintiff

v.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

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**REPLY EXPERT REPORT OF DR. DAN SCHONFELD REGARDING U.S. PATENT  
NO. 10,848,885 AND U.S. PATENT NO. 10,469,966**

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relevant to the asserted claims, the Jewel Cube does process and output audio because it receives audio data and outputs physical audio signals.

66. Regarding Dr. Almeroth's argument about "passive" versus "active" speakers, Dr. Almeroth does not cite any evidence that the Jewel Cubes are passive, again, to the extent that this is relevant to the claims. Dr. Almeroth's reliance on the Bose documentation to show that the speakers are passive is misplaced because that documentation merely provides instructions for how to connect Jewel Cubes to the Acoustimass module. For example, Dr. Almeroth did not disassemble a Jewel Cube to show that the circuitry within that device only includes passive components, and he does not cite any other evidence for his position.

67. Dr. Almeroth's opinions regarding SA-2 and SA-3 amplifiers are equally flawed. Specifically, Dr. Almeroth contends that these amplifiers would operate like an "Acoustimass module in the sense that it would receive an audio signal over an audio cable...with no two-way digital data packet communication." Almeroth Reb. Rep. ¶ 1260. Once again, Dr. Almeroth's analysis is not tied to the relevant claim language and instead relies upon new claim constructions not ordered by the Court. The documentation that Dr. Almeroth cites (BOSE\_SUB-0000001-55 at 11-12, 42; BOSE\_SUB-0000361-448 at 376) does not come close to establishing Dr. Almeroth's premise, and the awareness of the system of the connected speakers indicates that Dr. Almeroth's assumption about the "one-way" communication is inaccurate.

68. Finally, Dr. Almeroth asserts that "neither a Jewel Cube Speaker, Acoustimass module, or SA-2 or SA-3 amplifier is a "zone player" as required by the Asserted Claims of the '966 patent because they did not have the capability to change their "configur[ation]" as it related to audio playback in order to transition between "standalone mode" and grouped mode." Almeroth Reb. Rep. ¶ 1261. This is pure conjecture as Dr. Almeroth does not provide a single citation for his assertion nor does he provide any analysis to substantiate his assertion. It is also contrary to

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the evidence, as shown in my Opening Report, which detailed how these speakers can operate individually or as a group. *See* Schonfeld Opening Rpt. XI.D.

## 2. Bose Lifestyle 50 System does have “Zone Scenes”

69. The crux of Dr. Almeroth’s opinions regarding “zone scenes” relates to Bose’s ability to set up a “shared source” of audio that it can distribute from the centralized Multi-Room Interface to the speakers in the system. Almeroth Reb. Rep. ¶ 1269. Specifically, Dr. Almeroth proffers opinions regarding the “ROOM” and “HOUSE” buttons that are on the Personal Music Center, and contends that “when a ‘shared source group’ was activated, neither the Lifestyle players nor their connected speakers would change their configuration as it relates to audio playback.” *Id.* Dr. Almeroth then jumps to the conclusion that “there would be no coordination between the lifestyle players in a ‘shared source group’ and the Lifestyle players would not have had any awareness of whether or not they were part of a ‘shared source group.’” *Id.* I disagree. In my Opening Report I articulated several instances in which speakers in the Lifestyle system could be individually controlled even if they were part of a shared source group. Schonfeld Op. ¶ 734. Dr. Almeroth does not address these scenarios in his rebuttal report. Furthermore, as I noted with respect to the Squeezebox system, the claims do not require direct communication between the first and second zone players for those zone players to be “configured to coordinate” as claimed.

70. Next, Dr. Almeroth contends that “a temporary, ad-hoc group that was automatically activated at the time of creation and then only remained in existence during the limited time it was activated is distinctly different from a ‘zone scene,’ which requires a user-customized, pre-saved group of ‘zone players’ that is able to exist in an inactive state while remaining available for selection by a user so that it can later be invoked on demand for synchronous playback.” Almeroth Reb. Rep. ¶ 1271. But this latter part of Dr. Almeroth’s assertion is precisely what Bose allows users to do. In particular, Bose allows users to invoke the

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I, Dan Schonfeld, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

A handwritten signature in black ink that reads "Dan Schonfeld". The signature is written in a cursive style, with the first name "Dan" and the last name "Schonfeld" clearly legible. The signature ends with a large, circular flourish.

DATED: January 23, 2023

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Dan Schonfeld, Ph.D